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dba Chick-Fil-A at Centerville FSU #3259 and  
Chick-Fil-A, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DISTRICT**

MODERN FONT APPLICATIONS LLC, a  
Utah limited liability company

Plaintiff,

v.

KELLI KRISTINA SMITH dba CHICK-FIL-A AT CENTERVILLE FSU #3259; and CHICK-FIL-A, INC., a Georgia corporation,

Defendants.

**STIPULATED MOTION FOR  
EXTENSION OF TIME FOR THE  
CHICK-FIL-A DEFENDANTS TO  
RESPOND TO MODERN FONT LLC'S  
COMPLAINT**

Case No.: 2:19-cv-00211-TS

The Honorable Judge Ted Stewart

Defendants Kelli Kristina Smith dba Chick-Fil-A at Centerville FSU #3259 ("Kelli Smith") and Chick-Fil-A, Inc. ("Chick-Fil-A") (collectively, the "Chick-Fil-A Defendants") and plaintiff Modern Font Applications LLC ("Modern Font"), by and through their respective

counsel, hereby stipulate and move the Court to extend the time for the Chick-Fil-A Defendants to file their answer or otherwise respond to Modern Font's Complaint for Patent Infringement and Jury Demand (the "Complaint").

On April 1, 2019, Modern Font filed the Complaint in this case, asserting a claim for Patent Infringement. Modern Font served the Complaint on the Chick-Fil-A Defendants on April 3, 2019. Thus, the Chick-Fil-A's current deadline to respond to the Complaint is April 24, 2019. *See Fed. R. Civ. P. 12(a)(1)(A)(i).*

Good cause exists to grant the extension because the Chick-Fil-A Defendants require additional time to investigate Modern Font's allegations and to prepare their response. The Chick-Fil-A Defendants have conferred with Modern Font and the parties have agreed to a thirty (30) day extension of time for the Chick-Fil-A Defendants to respond to the Complaint. No previous extensions of time have been requested. Also, the Court has not yet entered a scheduling order in this case. Thus, no Court deadlines will be affected by this extension.

Accordingly, the parties stipulate and jointly request that the Court enter an Order extending the date for the Chick-Fil-A Defendants to answer or otherwise respond to the Complaint up to and including May 24, 2019. A proposed Order Granting Stipulated Motion for Extension of Time for the Chick-Fil-A Defendants to Respond to Complaint is being submitted concurrently with this filing.

DATED: April 24, 2019

STOEL RIVES LLP

/s/ David L. Mortensen

David L. Mortensen

Robert L. Lee  
Emily Chambers Welch  
ALSTON & BIRD LLP

Attorneys for Defendants Kelli Kristina Smith dba  
Chick-Fil-A at Centerville FSU #3259 and Chick-  
Fil-A, Inc.

DATED: April 24, 2019

KUNZLER BEAN & ADAMSON, PC

/s/ Perry Clegg (with permission)

Perry Clegg

Attorneys for Modern Font Applications LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of April 2019, I caused a true and correct copy of the foregoing **STIPULATED MOTION FOR EXTENSION OF TIME FOR THE CHICK-FIL-A DEFENDANTS TO RESPOND TO MODERN FONT LLC'S COMPLAINT** to be served via CM/ECF on the following:

Perry Clegg  
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*/s/ Stacy A. Kamaya* \_\_\_\_\_